

Objection Deadline: Wednesday, April 10, 2024, 4:00 PM EDT
Presentment Date: Monday, April 15, 2024, 11:00 AM EDT
Hearing Date and Time (Only if Objection Filed): TBD

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Attorneys for the Consumer Claims Trustee

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	Chapter 11
	:	
DITECH HOLDING CORPORATION, et al.,	:	Case No. 19-10412 (JLG)
	:	
Wind Down Estates.¹	:	(Jointly Administered)
	:	Related Docket Nos. 3280, 4662
-----X	:	

NOTICE OF PRESENTMENT
OF STIPULATION RESOLVING PROOF OF CLAIM OF SHAN WHITE
(CLAIM NO. 24613)

¹ On September 26, 2019, the Court confirmed the *Third Amended Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors* (ECF No. 1404) (the “**Third Amended Plan**”), which created the Wind Down Estates. On February 22, 2022, the Court entered the Order Granting Entry of Final Decree (I) Closing Subsidiary Cases; and (II) Granting Related Relief (ECF No. 3903) (the “**Closing Order**”). Pursuant to the Closing Order, the chapter 11 cases of the following Wind Down Estates were closed effective as of February 22, 2022: DF Insurance Agency LLC (6918); Ditech Financial LLC (5868); Green Tree Credit LLC (5864); Green Tree Credit Solutions LLC (1565); Green Tree Insurance Agency of Nevada, Inc. (7331); Green Tree Investment Holdings III LLC (1008); Green Tree Servicing Corp. (3552); Marix Servicing LLC (6101); Mortgage Asset Systems, LLC (8148); REO Management Solutions, LLC (7787); Reverse Mortgage Solutions, Inc. (2274); Walter Management Holding Company LLC (9818); and Walter Reverse Acquisition LLC (8837). Under the Closing Order, the chapter 11 case of Ditech Holding Corporation (the “**Remaining Wind Down Estate**”) (Case No. 19-10412 (JLG)) remains open and, as of February 22, 2022, all motions, notices and other pleadings relating to any of the Wind Down Estates are to be filed in the case of the Remaining Wind Down Estate. The last four digits of the Remaining Wind Down Estate’s federal tax identification number is (0486). The Remaining Wind Down Estate’s principal offices are located at 2600 South Shore Blvd., Suite 300, League City, TX 77573.

PLEASE TAKE NOTICE that the Consumer Claims Trustee,² will present the *Stipulation Resolving Proof of Claim No. 24613* (the “**Stipulation**”) to the Honorable James L. Garrity, Jr., United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, Courtroom 723 (the “**Courtroom**”), One Bowling Green, New York, New York 10004, for signature on **Monday, April 15, 2024, at 11:00 AM EDT**. A copy of the Stipulation is attached to this Notice as Exhibit A. The Stipulation resolves Proof of Claim No. 24613 by reducing and allowing the claim in the amount of \$3,133.53 as a Class 6 Consumer Creditor Claim and that is not a 363(o) claim as defined by the Third Amended Plan.

PLEASE TAKE FURTHER NOTICE that unless a written objection to the Stipulation is served and filed with proof of service with the Clerk of the Court and a courtesy copy is delivered to the undersigned and to the Chambers of Judge Garrity so as to be received by **Wednesday, April 10, 2024, at 4:00 PM EDT**, there will not be a hearing to consider the Stipulation, and the Court may approve the Stipulation without further notice.

PLEASE TAKE FURTHER NOTICE that if a written objection is timely filed and served with respect to the Stipulation, a hearing (the “**Hearing**”) will be held to consider the Proposed Stipulation before Judge Garrity in the Courtroom at a date and time to be announced.

² The Consumer Representative under the Third Amended Plan acts as the Consumer Trustee on behalf of the Ditech Holding Corporation Consumer Creditor Recovery Trust (the “**Consumer Trust**”), established pursuant to the Third Amended Plan.

PLEASE TAKE FURTHER NOTICE that objecting parties are required to attend the Hearing, and failure to appear may result in relief being granted upon default.

Dated: April 1, 2024
New York, New York

/s/ Richard Levin
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EXHIBIT A

STIPULATION RESOLVING PROOF OF CLAIM NO. 24613

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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	:
In re	:
	:
DITECH HOLDING CORPORATION, et al.,	:
	:
Debtors. ¹	:
	:
-----X	

Chapter 11
Case No. 19-10412 (JLG)
(Jointly Administered)
Related Docket Nos. 3280, 4662

STIPULATION RESOLVING PROOF OF CLAIM NO. 24613

This stipulation (the “**Stipulation**”) is made and entered into between the Consumer Claims Trustee,² and Shan White (the “**Claimant**” and together with the Consumer Claims Trustee, the “**Parties**”). The Stipulation resolves the objection to Proof of Claim No. 24613 by allowing the claim as indicated below.

1. On February 11, 2019, Ditech Holding Corporation (f/k/a Walter Investment Management Corp.) and certain of its affiliates (collectively, the “**Debtor**”) each commenced with this Court a voluntary case under chapter 11 of title 11 of the United States Code.

¹ On September 26, 2019, the Court confirmed the *Third Amended Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors* (ECF No. 1404) (the “**Third Amended Plan**”), which created the Wind Down Estates. On February 22, 2022, the Court entered the Order Granting Entry of Final Decree (I) Closing Subsidiary Cases; and (II) Granting Related Relief (ECF No. 3903) (the “**Closing Order**”). Pursuant to the Closing Order, the chapter 11 cases of the following Wind Down Estates were closed effective as of February 22, 2022: DF Insurance Agency LLC (6918); Ditech Financial LLC (5868); Green Tree Credit LLC (5864); Green Tree Credit Solutions LLC (1565); Green Tree Insurance Agency of Nevada, Inc. (7331); Green Tree Investment Holdings III LLC (1008); Green Tree Servicing Corp. (3552); Marix Servicing LLC (6101); Mortgage Asset Systems, LLC (8148); REO Management Solutions, LLC (7787); Reverse Mortgage Solutions, Inc. (2274); Walter Management Holding Company LLC (9818); and Walter Reverse Acquisition LLC (8837). Under the Closing Order, the chapter 11 case of Ditech Holding Corporation (the “**Remaining Wind Down Estate**”) (Case No. 19-10412 (JLG) remains open and, as of February 22, 2022, all motions, notices and other pleadings relating to any of the Wind Down Estates are to be filed in the case of the Remaining Wind Down Estate. The last four digits of the Remaining Wind Down Estate’s federal tax identification number is (0486). The Remaining Wind Down Estate’s principal offices are located at 2600 South Shore Blvd., Suite 300, League City, TX 77573.

² The Consumer Representative under the Third Amended Plan acts as the Consumer Claims Trustee on behalf of the Ditech Holding Corporation Consumer Creditor Recovery Trust (the “**Consumer Trust**”), established pursuant to the Third Amended Plan in the above-captioned bankruptcy cases.

2. On September 26, 2019, the Court confirmed the Debtors' Third Amended Plan. Under the Third Amended Plan, (i) the Plan Administrator, on behalf of each of the Wind Down Estates, has exclusive authority to object to all Administrative Expense Claims, Priority Tax Claims, Priority Non-Tax Claims, and Other Secured Claims; (ii) the GUC Recovery Trustee, on behalf of the GUC Recovery Trust, has the exclusive authority to object to all General Unsecured Claims; and (iii) the Consumer Claims Trustee has the exclusive authority to object to all Consumer Creditor Claims.

3. On November 8, 2019, Claimant filed Proof of Claim No. 24613 asserting a secured claim in the amount of \$30,000.00 and a priority claim in the amount of \$2,850.00, for a total claimed amount of \$32,850.00.

4. On March 19, 2021, the Plan Administrator and Consumer Claims Trustee jointly filed the *Notice of Hearing on Seventy-Second Omnibus Objection to Proofs of Claim (No Basis Consumer Creditor Claims)* (ECF No. 3280) (the "**Objection**"), which included an objection to Proof of Claim No. 24613.

5. On March 24, 2023, the Plan Administrator and Consumer Claims Trustee jointly filed the *Consumer Claims Trustee and Plan Administrator's Joint Omnibus Motion to Reclassify Certain Proofs of Claim and Consumer Claims Trustee's Motion to Estimate for Purposes of Distribution Reserves* (the "**Motion to Estimate**") (ECF No. 4662), which included a request to estimate Proof of Claim No. 24613 at \$32,850.00, as an unsecured claim, for the purpose of setting distribution reserves.

6. On May 10, 2023, the Court granted the relief requested in the Motion to Estimate. The *Order Granting Consumer Claims Trustee and Plan Administrator's Joint Omnibus Motion to Reclassify Certain Proofs of Claim and Consumer Claims Trustee's Motion to Estimate for Purposes of Distribution Reserves* (the "**Order to Estimate**"), estimating

Claim No. 24613 at \$32,850.00, as an unsecured claim, for the purpose of setting distribution reserves, was entered on May 10, 2023. (ECF No. 4732).

7. The Parties have negotiated a settlement with respect to Proof of Claim No. 24613.

8. The Consumer Claims Trustee has determined that entering into this Stipulation is in the best interests of the Wind Down Estates, the Consumer Trust, the Consumer Trust's constituents, the Debtors, and other interested parties.

9. The Parties stipulate and agree that Proof of Claim No. 24613: (a) shall be reduced and allowed in the amount of \$3,133.53 as a Class 6 Consumer Creditor Claim and (b) is a not a 363(o) Claim (as defined in the Third Amended Plan).

10. Claimant understands that claim distributions will be paid in the order specified by the Third Amended Plan and that any actual amount received may be on a pro rata basis.

11. The money damages awarded to Claimant represent the actual amount in dispute and are designated as a legal, compensatory remedy for monetary loss to the Claimant.

12. The terms of this Stipulation shall be deemed to fully resolve any and all claims (as defined in section 101(5) of the Bankruptcy Code) that the Claimants assert or may have against the Debtors, their estates, and the Consumer Trust.

13. The Parties agree to take any and all actions necessary to comply with the terms of this agreement.

14. This Stipulation constitutes the entire agreement between the Parties regarding the matters addressed herein. The Stipulation supersedes all prior and current discussions, negotiations, understandings and agreements, whether oral or written, express or implied, between the Parties.

15. This Stipulation may only be modified by written agreement of all Parties or pursuant to an order of the Bankruptcy Court.

16. The Bankruptcy Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and/or enforcement of this Stipulation.

Dated: April 1, 2024
New York, New York

CONSENTING PARTY

/s/ Richard Levin
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CONSENTING PARTY

/s/ Shan White
Shan White, *pro se*
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SO ORDERED:

Dated: _____
New York, New York

THE HONORABLE JAMES L. GARRITY, JR.
UNITED STATES BANKRUPTCY JUDGE